

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

VANGUARD ENERGY, LLC

Plaintiff,

V.

GLOBAL ENTERPRISE SOLUTIONS,
LLC and XD VENTURES, LLC,

Defendants.

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Civil Matter No.: 1:21-cv-00117

Jury Demanded

THIRD STIPULATION AND ORDER TO MODIFY AGREED SCHEDULING ORDER
(DOC. 42) AND PRIOR STIPULATIONS AND ORDER (DOC.44 & DOC. 45)

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff and Counter-Defendant, Vanguard Energy, LLC (“Vanguard”), and Counter-Plaintiffs Global Enterprise Solutions, LLC (“GES”) and XD Ventures, LLC (“XD”) (collectively “The Parties”), through their respective counsel of record, jointly submit the following Third Stipulation to Modify Agreed Scheduling Order to extend the deadlines pertaining to experts set by the Court as set forth in Agreed Scheduling Order (Doc. 42) and Stipulations and Order to Modify Agreed Scheduling Order (Doc. 44 and Doc. 45) in this case.

This Third Stipulation is made pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4).

The parties stipulate and agree to a short continuance of Defendant's expert deadlines to allow more time to designate expert witnesses, prepare expert reports and evaluate what further discovery is needed to ready this case for trial. The Parties stipulate to extend the September 18, 2023 expert and report deadline pursuant to FRCP 26(a)(2)(D); Local Rule 9(A)(5) to Monday, October 2, 2023.

STIPULATION

WHEREFORE, IT IS STIPULATED AND AGREED BY AND BETWEEN THE PARTIES,
that the following deadlines pertaining to experts are stipulated below.

Deadline	Current Deadline	Stipulated Deadline
Defendant's expert and report deadline: See FRCP 26(a)(2)(D); Local Rule 9(A)(5).	09/18/2023	10/02/2023

IT IS SO STIPULATED.

Dated: September 19, 2023.

Respectfully submitted,

Butch Boyd Law Firm

/s/ Butch Boyd

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***COUNSEL FOR DEFENDANT AND
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ENTERPRISE SOLUTIONS, LLC AND XD
VENTURES, LLC***

Dated: September 19, 2023.

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/s/ E. Michael Rodriguez *with permission

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***ATTORNEYS FOR PLAINTIFF, AND
COUNTER-DEFENDANT VANGUARD
ENERGY LLC***

IT IS SO ORDERED.

Dated: _____

ROLANDO OLVERA

UNITED STATES DISTRICT JUDGE